

TRI PROJECT FACILITY SHEET

Facility Name: American Electric Power Conesville Plant
Address: 47201 County Road 273
City, ST, Zip Code: Conesville, OH 43811
County: Coshocton
Contact Person: Patrick A. Dal Porto
Title: Manager, Air Quality Services

Chemical Name: Hydrochloric Acid
One Time Release: Y/N Quantity: _____
ERNS Report: Y/N Chemical Name: _____
Quantity: _____

Total Released 2003: ~~660,000~~ 6,600,000 / 260 = 2538 Per Day
Continuous Release Report: Y/N Chemical Name: _____
Air Permit: Y/N Water Permit: Y/N
Inventory Reporting Section 312: Y/N

Chemical Name: Hydrogen Sulfide
One Time Release: Y/N Quantity: _____
ERNS Report: Y/N Chemical Name: _____
Quantity: _____

Total Released 2003: 390,000 / 260 = 1500 Per Day
Continuous Release Report: Y/N Chemical Name: _____
Air Permit: Y/N Water Permit: Y/N

Chemical Name: Sulfuric Acid
One Time Release: Y/N Quantity: _____
ERNS Report: Y/N Chemical Name: _____
Quantity: _____

Total Released 2003: 220,000 / 260 = 2769 Per Day
Continuous Release Report: Y/N Chemical Name: _____
Air Permit: Y/N Water Permit: Y/N

Chemical Name: _____
One Time Release: Y/N Quantity: _____
ERNS Report: Y/N Chemical Name: _____
Quantity: _____

Total Released 2003: _____
Continuous Release Report: Y/N Chemical Name: _____
Air Permit: Y/N Water Permit: Y/N



May 11, 2001

U.S. EPA Region V
Office of CEPP Chemical Preparedness
77 West Jackson Blvd.
Chicago, IL 60604

Re: American Electric Power
Annual Follow-up Continuous Release Notification

Dear Sir or Madam:

Please find enclosed first anniversary follow-up reports on continuous release notifications for the following facilities:

Facility Name	CR-ERNS Number	Facility Location
Big Sandy Plant	522751	Louisa, KY 41230
Cardinal Plant	522824, 522825 & 522827	Brilliant, OH 43913
Conesville Plant	522818, 522820, 522822 & 522823	Conesville, OH 43811
Gavin Plant	522747 & 522748	Cheshire, OH 45620
Kammer Plant	522800	Moundsville, WV 26041
Mitchell Plant	522794	Moundsville, WV 26041
Mountaineer Plant	522753	New Haven, WV 25265
Muskingum River Plant	522754 & 522755	Waterford, OH 45786
Picway Plant	522789	Lockbourne, OH 43137
Rockport Plant	522778	Rockport, IN 47635
Philip Sporn Plant	522816 & 522817	New Haven, WV 25265

These reports are being submitted in accordance with 40 CFR §302.8 to follow up initial written notifications made in May 2000. These reports were prompted by the issuance of an interim guidance document by the Environmental Protection Agency on December 21, 1999 giving notice of specific interpretations of the definition of a "federally permitted release" under Section 101 (10)(H) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). AEP does not agree with the positions announced in the guidance and has participated in the review and evaluation of the initial guidance and subsequent guidance documents. However, the enclosed reports are based on the interpretations announced in the interim guidance.

Please note that the emissions reported in the enclosed reports represent a range of levels at which individual hazardous constituents may be present in the emissions associated with the normal operations of the major sources at our power plants. They do not represent "emergency" conditions, pose threats to public health or welfare or require specific emergency response or planning activities. Actual emissions will vary with hours of operation, fuel quality and other factors.

If you have any questions concerning the enclosed reports, please contact me at (614) 223-1246.

Sincerely,

Thomas R. Zelina
Manager, Waste Management and Mediation Services

**SECTION I: GENERAL
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Date of Initial Call to NRC: 03/13/00

Type of Report: Indicate below the type of report you are submitting.

☐ Initial Written Notification ☒ First Anniversary Follow-up Report ☐ Written Notification of a Change to Initial Notification ☐ Written Notification of a Change to Follow-up Report

Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Dan Lambert, Plant Manager

Name and Position

5/8/01
Date

[Signature] FOR DAN LAMBERT
Signature

Part A. Facility or Vessel Information

Name of Facility or Vessel

Conesville Unit Nos. 1 and 2, Conesville Unit No. 3,
Conesville Unit No. 4, and Conesville Unit Nos. 5 and 6

Person
in Charge
of Facility
or Vessel

Name of Person in Charge Dan Lambert

Position Plant Manager

Telephone No. (740) 829-4101

Alternate Telephone No. ()

Facility
Address or
Vessel
Port of
Registration

Street 47201 County Road 273

County Coshocton

City Conesville

State OH Zip Code 43811

Dun and Bradstreet Number for Facility

069068450

Facility/Vessel
Location

Latitude Deg 040 Min 11 Sec 08
Longitude Deg 081 Min 52 Sec 48

Vessel LORAN Coordinates

Part B. Population Information

Population
Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

___ 0 - 50 persons ___ 101 - 500 persons ___ more than 1000 persons
___ 51 - 100 persons ☒ 501 - 1000 persons

Sensitive
Populations
and
Ecosystems
Within One
Mile Radius

Sensitive Populations or Ecosystems
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

Distance and direction from facility

Conesville Elementary School
Wetland
Wetland

3/4-mi., N.W.
3/4-mi., N.
1/2-mi., S.

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Conesville Stack CS012

1. Indicate whether the release from this source is either:

continuous without interruption _____ OR routine, anticipated, intermittent X

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

The releases associated with this source result from the combustion of fossil fuels to produce steam energy for production of electricity.

Calculations for releases of identified substances include periods of startup and shutdown and certain circumstances that may be defined as malfunctions under other state and federal regulatory programs but meet the requirements for inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by reference into 40 CFR Part 355 Emergency Planning and Notification.

3. Identify below how you established the pattern of release and calculated release estimates.

<u> X </u> Past release data	<u> X </u> Knowledge of the facility/vessel's operations and release history	<u> X </u> Engineering estimate
<u> X </u> AP-42	<u> X </u> Best professional judgment	_____ Other (explain)

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE
INFORMATION**
(continued)

CR-ERNS Number: 522618; 522820;
522822; 522823

Name of Source: Conesville Stack CS012

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 450 feet ~~or meters~~; OR

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☒ **SURFACE WATER** (stream , lake , or other)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; OR

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☒ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter feet or meters

Gas Exit Velocity feet/second or
meters/second

Gas Temperature degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity feet/second
of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Conesville Stack CS012

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Nitrogen oxide	10102439 ✓	99,622	57,871	365	13,600,524	12
Nitrogen dioxide	10102440 ✓	5,243	3,046	365	715,800	12
Hydrochloric acid	7647010 ✓	4,212	2,297	365	960,000	12
Hydrogen fluoride	7664393 ✓	430	235	365	81,000	12
Sulfuric acid	7664939 ✓	2,593	1,506	365	374,000	12
Calcium arsenate	7778441 ✓	5.2	1.5	365	354	12
Mercury	7439976 ✓	0.9	0.5	365	194	12
Selenium dioxide	7446084 ✓	11.8	4.1	365	2,352	12
Acrolein	107028 ✓	0.2	0.1	365	27	12
Cyanides	57125 ✓	8.9	4.4	365	1,475	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Conesville Stack 3

1. Indicate whether the release from this source is either:

continuous without interruption _____ OR routine, anticipated, intermittent X

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

The releases associated with this source result from the combustion of fossil fuels to produce steam energy for production of electricity.

Calculations for releases of identified substances include periods of startup and shutdown and certain circumstances that may be defined as malfunctions under other state and federal regulatory programs but meet the requirements for inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by reference into 40 CFR Part 355 Emergency Planning and Notification.

3. Identify below how you established the pattern of release and calculated release estimates.

<u>X</u> Past release data	<u>X</u> Knowledge of the facility/vessel's operations and release history	<u>X</u> Engineering estimate
<u>X</u> AP-42	<u>X</u> Best professional judgment	_____ Other (explain)

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE
INFORMATION**
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Name of Source: Conesville Stack 3

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a waste pile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 450 feet or ~~meters~~; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☒ **SURFACE WATER** (stream , lake , or other)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☒ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter feet or meters

Gas Exit Velocity feet/second or
meters/second

Gas Temperature degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity feet/second
of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Conesville Stack 3

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Nitrogen oxide	10102439	31,303	13,008	365	3,136,000	12
Nitrogen dioxide	10102440	1,648	685	365	165,000	12
Hydrochloric acid	7647010	2,722	1,068	365	580,000	12
Hydrogen fluoride	7664393	278	109	365	49,000	12
Sulfuric acid	7664939	1,720	280	365	113,000	12
Calcium arsenate	7778441	3.4	0.7	365	352	12
Mercury	7439976	0.6	0.3	365	118	12
Selenium dioxide	7446084	7.6	2.8	365	1,424	12
Acrolein	107028	0.1	0.0	365	17	12
Cyanides	57125	7.6	3.8	365	892	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Conesville Stack 4

1. Indicate whether the release from this source is either:

continuous without interruption _____ OR routine, anticipated, intermittent X _____.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

The releases associated with this source result from the combustion of fossil fuels to produce steam energy for production of electricity.

Calculations for releases of identified substances include periods of startup and shutdown and certain circumstances that may be defined as malfunctions under other state and federal regulatory programs but meet the requirements for inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by reference into 40 CFR Part 355 Emergency Planning and Notification.

3. Identify below how you established the pattern of release and calculated release estimates.

<u>X</u> Past release data	<u>X</u> Knowledge of the facility/vessel's operations and release history	<u>X</u> Engineering estimate
<u>X</u> AP-42	<u>X</u> Best professional judgment	_____ Other (explain)

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE
INFORMATION**
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Name of Source: Conesville Stack 4

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a waste pile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 800 feet ~~or meters~~; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☐ **SURFACE WATER** (stream , lake , or other)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter feet or meters

Gas Exit Velocity feet/second or
meters/second

Gas Temperature degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity feet/second
of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Conesville Stack 4

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Nitrogen oxide ✓	10102439	120,743	34,522	365	17,600,000	12
Nitrogen dioxide ✓	10102440	6,355	1,817	365	930,000	12
Hydrochloric acid ✓	7647010	10,620	2,850	365	2,720,000	12
Hydrogen fluoride ✓	7664393	1,084	291	365	230,000	12
Sulfuric acid ✓	7664939	3,868	745	365	442,000	12
Mercury ✓	7439976	2.3	0.6	365	538	12
Selenium dioxide ✓	7446084	29.8	5.7	365	6,688	12
Calcium arsenate ✓	7778441	13.5	1.9	365	1,756	12
Cyanides ✓	57125	17.8	5.6	365	4,241	12
Acrolein ✓	107028	0.3	0.1	365	77	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822- 522823

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Conesville Stack CS056

1. Indicate whether the release from this source is either:

continuous without interruption _____ OR routine, anticipated, intermittent X _____

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

The releases associated with this source result from the combustion of fossil fuels to produce steam energy for production of electricity.

Calculations for releases of identified substances include periods of startup and shutdown and certain circumstances that may be defined as malfunctions under other state and federal regulatory programs but meet the requirements for inclusion in 40 CFR Part 302.8 Continuous Releases, and as incorporated by reference into 40 CFR Part 355 Emergency Planning and Notification.

3. Identify below how you established the pattern of release and calculated release estimates.

<u>X</u> Past release data	<u>X</u> Knowledge of the facility/vessel's operations and release history	<u>X</u> Engineering estimate
<u>X</u> AP-42	<u>X</u> Best professional judgment	_____ Other (explain)

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE
INFORMATION**
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Name of Source: Conesville Stack CS056

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a waste pile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 800 feet ~~or meters~~ **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☐ **SURFACE WATER** (stream , lake , or other)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter feet or meters

Gas Exit Velocity feet/second or
meters/second

Gas Temperature degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity feet/second
of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Conesville Stack CS056

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Nitrogen oxide ✓	10102439	129,130	35,035	365	19,570,000	12
Nitrogen dioxide ✓	10102440	6,796	1,844	365	1,030,000	12
Hydrochloric acid ✓	7647010	12,819	3,184	365	611,000	12
Hydrogen fluoride ✓	7664393	1,309	325	365	46,000	12
Sulfuric acid ✓	7664939	3,381	408	365	320,000	12
Mercury ✓	7439976	2.2	0.5	365	343	12
Selenium dioxide ✓	7446084	36.0	6.3	365	1,749	12
Calcium arsenate ✓	7778441	11.5	1.5	365	1,132	12
Cyanides ✓	57125	22.9	5.9	365	5,002	12
Acrolein ✓	107028	0.4	0.1	365	90	12

9785 Tons

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Conesville Auxiliary Boiler 4

1. Indicate whether the release from this source is either:

continuous without interruption _____ OR routine, anticipated, intermittent 1 _____.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

Combustion of fuel oil to produce steam for heat or unit start-up.

3. Identify below how you established the pattern of release and calculated release estimates.

<u>X</u> Past release data	<u>X</u> Knowledge of the facility/vessel's operations and release history	<u>X</u> Engineering estimate
<u>X</u> AP-42	<u>X</u> Best professional judgment	_____ Other (explain)

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

**SECTION II: SOURCE
INFORMATION**
(continued)

CR-ERNS Number: 522818; 522820;
522822; 522823

Name of Source: Conesville Auxiliary Boiler 4

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☒ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

If identified source is a **stack**, indicate stack height: 240 feet or ~~meters~~; **OR**

If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☐ **SURFACE WATER** (stream , lake , or other)

If the release affects any **surface water body**, give the name of the water body.

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; **OR**

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter feet or meters

Gas Exit Velocity feet/second or
meters/second

Gas Temperature degrees Fahrenheit,
Kelvin, or Celsius

For a release to surface water, provide the following information, if available:

Average Velocity feet/second
of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number:

522818; 522820;
522822; 522823

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Conesville Auxiliary Boiler 4

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Calcium arsenate	7778-44-1	0.003	0	1 or more	0.003	12 or more
Mercury	7439-97-6	0.0002	0	1 or more	0.0002	12 or more
Selenium oxide	7446-08-4	0.001	0	1 or more	0.001	12 or more
Hydrochloric acid	7647-01-0	1.2	0	1 or more	1.2	12 or more
Hydrofluoric acid	7664-39-3	0.056	0	1 or more	0.056	12 or more
Sulfuric acid	7664-93-9	3.6	0	1 or more	3.6	12 or more
Nitrogen oxide	10102-43-9	69	0	1 or more	69	12 or more
Nitrogen dioxide	10102-44-0	3.6	0	1 or more	3.6	12 or more

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number:

522818; 522820;
522822; 522823

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source:

Conesville Auxiliary Boiler 1

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Calcium arsenate	7778-44-1	0.003	0	1 or more	0.003	12 or more
Mercury	7439-97-6	0.0002	0	1 or more	0.0002	12 or more
Selenium oxide	7446-08-4	0.001	0	1 or more	0.001	12 or more
Hydrochloric acid	7647-01-0	1.2	0	1 or more	1.2	12 or more
Hydrofluoric acid	7664-39-3	0.056	0	1 or more	0.056	12 or more
Sulfuric acid	7664-93-9	3.6	0	1 or more	3.6	12 or more
Nitrogen oxide	10102-43-9	69	0	1 or more	69	12 or more
Nitrogen dioxide	10102-44-0	3.6	0	1 or more	3.6	12 or more

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen oxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or G)</u>
Conesville Stack CS012	99,622
Conesville Stack 3	31,303
Conesville Stack 4	120,743
Conesville Stack CS056	129,130

TOTAL - SSI trigger for this hazardous substance release* : 380,798 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 522818; 522820;
522822; 522923

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Nitrogen dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or Gd)</u>
Conesville Stack CS012	5,243
Conesville Stack 3	1,648
Conesville Stack 4	6,355
Conesville Stack CS056	6,796

TOTAL - SSI trigger for this hazardous substance release* : 20,042 lbs.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

**SECTION III: SUBSTANCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Hydrochloric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of
the Release (specify lbs., kg, or G)

Conesville Stack CS012	4,212
Conesville Stack 3	2,722
Conesville Stack 4	10,620
Conesville Stack CS056	12,819

TOTAL - SSI trigger for this hazardous substance release* : 30,373 lbs.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Hydrogen fluoride

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg, or G)</u>
Conesville Stack CS012	430
Conesville Stack 3	278
Conesville Stack 4	1,084
Conesville Stack CS056	1,309

TOTAL - SSI trigger for this hazardous substance release* : 3,101 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Sulfuric acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of the Release (specify lbs., kg, or G)

Conesville Stack CS012	2,593
Conesville Stack 3	1,720
Conesville Stack 4	3,868
Conesville Stack CS056	3,381

TOTAL - SSI trigger for this hazardous substance release* : 11,562 lbs.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

SECTION III: SUBSTANCE INFORMATION

CR ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Mercury

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of
the Release (specify lbs., kg, or Gi)

Conesville Stack CS012

0.9

Conesville Stack 3

0.6

Conesville Stack 4

2.3

Conesville Stack CS056

2.2

TOTAL - SSI trigger for this hazardous substance release* : 6.0 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Selenium dioxide

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of
the Release (specify lbs., kg or Gm)

Conesville Stack CS012	11.8
Conesville Stack 3	7.6
Conesville Stack 4	29.8
Conesville Stack CS056	36.0

TOTAL - SSI trigger for this hazardous substance release*: 85.2 lbs.

* This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance:

Calcium arsenate

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs. kg or G)</u>
Conesville Stack CS012	5.2
Conesville Stack 3	3.4
Conesville Stack 4	13.5
Conesville Stack CS056	11.5

TOTAL - SSI trigger for this hazardous substance release* : 33.6 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

**SECTION III: SUBSTANCE
INFORMATION**

CR-ERNS Number: 522818; 522820;
522822; 522823

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Cyanides

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)

Upper Bound of the Normal Range of
the Release (specify lbs., kg, etc.)

Conesville Stack CS012	8.9
Conesville Stack 3	7.6
Conesville Stack 4	17.8
Conesville Stack CS056	22.9

TOTAL - SSI trigger for this hazardous substance release* : 57.2 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*